

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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MEMO ENDORSED

February 18, 2022

VIA ECF

Honorable Valerie E. Caproni
United States District Court
Southern District of New York
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 2/18/22

Re: United States v. Jeremy Lambert, 21-Cr-585 (VEC)

Dear Judge Caproni:

I am writing to request an adjournment of Mr. Lambert's reply to February 25, 2022 as I am currently on trial. Additionally, as it is likely that my trial will conflict with the upcoming February 23, 2022 conference, the defense is requesting an adjournment of that date as well. Given the prosecution's concessions that a hearing is necessary in this case, if it is amenable to the Court, both parties would consent to adjourning the matter for a future date for the commencement of the suppression hearing. I have consulted with the prosecution and they consent to the above adjournment requests.

Thank you for your consideration of this matter.

Respectfully submitted,

Marisa K. Cabrera
/s/

Marisa K. Cabrera
Attorney for Jeremy Lambert

cc: AUSA Matthew Shahabian

Application GRANTED. The deadline for Defendant to reply to the Government's response is hereby ADJOURNED *nunc pro tunc* from February 16, 2022 until February 25, 2022. The status conference currently scheduled for February 23, 2022 at 2:30 p.m. is hereby ADJOURNED *sine die*. The parties must appear for an evidentiary hearing on Defendant's motion to suppress on **Tuesday, March 22, 2022, at 10:00 a.m. in Courtroom 443**, Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, NY 10007.

The parties must submit witness and exhibit lists to the Court on ECF and in the form of physical courtesy copies not later than **March 18, 2022**.

SO ORDERED.

Handwritten signature of Valerie Caproni in blue ink, followed by the date 2/18/22.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE